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United States District Court Southern Division  
 Dear Cochran,  
 plaintiff,  
 vs.  
 Sioux Valley Hospital,  
 defendant.

C.V. 12-4068

Complaint

FILED

APR 13 2012

  
 CLERK

## (A) Parties

## (1) Plaintiff:

Dear Cochran, 1600 North Drive, Sioux Falls, SD 57117

## (2) Defendant:

Unknown Doctor, 900 East 45th Street North, Sioux Falls, SD 57117

## (B) Claims

(1) On or about the 28th day of February, 1984 I Dear Cochran was given birth to by my mother Linda Cochran at the Sioux Valley Hospital in Sioux Falls, S.D.

(2) It was on or about this day that an Unknown Doctor who was employed by Sioux Valley Hospital performed a procedure known as a circumcision upon myself which removes the foreskin from the penis of a male baby when they are born and sometimes grown children as well as adults.

(3.) This procedure is unnecessary, unethical, and immoral. It has no medical benefits and is said to cause more problems than it might prevent. It is a practice that came from an ancient religious right of passage into adulthood. It is child abuse. It is also indicative of our societies sickening stigma surrounding the male penis and new evidence suggests that it may be more

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beneficial to leave the foreskin attached as it acts as a form of protection for the glans (head) of the penis.

(4.) I was recently made aware of the fact that I had been circumcized and that because this unnecessary procedure had been performed upon me as a helpless baby infant newborn child I was robbed of sensitivity during sexual intercourse as well as the sense of security and wellbeing I am entitled to in my person.

(5.) It is said that the foreskin contains as many as 10,000 nerve endings and that its purpose is to keep the penis clean and protected from damage due to exposure to the elements. Constant over exposure to the elements causes nerve sensitivity reducing the overall pleasure felt during sexual intercourse. The foreskin itself contains nerve endings as well which are lost and when the procedure is performed it causes nerve damage to the skin that is left behind.

(6.) Unknown Doctor who performed this procedure had misled my mother by failing to inform her that there are no medically necessary reasons for performing this procedure and so by the Unknown Doctors acts or omissions I was permanently and irreversibly scarred and deformed. By doing so the Unknown Doctor infringed upon the rights of my mother, father, and self. My mother and father were unable to make an informed decision because they were not provided with the facts necessary. The issue at hand is one of medical malpractice.

(7.) Esthetically the foreskin could be replaced but normal function would not be restored. It is said that some sensitivity could be gain but overall it would be for looks. I will never know how

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it feels to have that sensitivity during sexual intercourse and have a normal sex life that is pleasurable for myself and my partners. I have always felt inadequate and I believe this is because somehow I knew something was wrong with me though I never knew what it was. I have a dark ring where my foreskin had been attached. This serves as a painful reminder of how something I was born with had been taken away from me. Until now it was only a feeling but now I know. Somehow like when a person loses a limb and swears that they could feel it. I could sense a part of me was gone and I longed for it back.

(8.) I would like my foreskin restored in the hopes I could feel whole again. It is said with a new procedure they can duplicate the look and feel of a normal functioning penis though some sensitivity may be returned it is only for looks. Some have reported that after the surgery they feel better about their penis and adequate during sexual intercourse with their partners.

### (C.) Relief

- (1.) I pray that the Sioux Valley Hospital be held responsible for the actions of Unknown Doctor and that they make proper adjustments to policy and procedure to prevent further unnecessary mutilation of another child's genitals and issue a formal apology to me.
- (2.) I pray that the Hospital perform the restoration surgery or outsource to another facility all costs to be covered by the Sioux Valley Hospital at no expense to me.

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- (3) I pray that the Sioux Valley Hospital pay all costs in this suit including attorney fees and any costs incurred by plaintiff.
- (4) I pray that the courts and the Sioux Valley Hospital make all necessary arrangements for the prison officials to transport me to their facility or other facility for the surgery and all other appointments before and after surgery for follow-up with the Hospital.
- (5) I pray for compensatory damages in the amount of \$500.00 dollars for pain and suffering.
- (6) I pray for punitive damages in the amount of \$300.00 dollars for pain and suffering.
- (7) I pray for a jury trial on all triable issues triable by jury.
- (8) I pray that the court decide what it deems to be just and proper.

### (D.) Venue

- (1.) 28 U.S.C. section 1391(b)(2) events given rise to claim occurred in district.
- (2.) This is a civil suit action for Medical Malpractice.

### (E.) Verification

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct. Executed at Sioux Falls, SD on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. Signature: \_\_\_\_\_

1305 W 18th Street  
PO Box 5039  
Sioux Falls, SD 57117-5039



Ph: (605) 333-1000  
sanfordhealth.org

February 22, 2012

Dean Cochrun, #552  
P. O. Box 5911  
Sioux Falls, SD 57117

Dear Mr. Cochrun,

We have received your letter expressing your concern that you were circumcised as an infant and would now like to have your foreskin surgically replaced. Elective procedures such as circumcision are not done without the express consent of the parent of the infant.

Surgical replacement of the foreskin is not a procedure that is not done in Sioux Falls by any local urologist, and Sanford Medical Center will not pay for this procedure to be done elsewhere. There will be no further correspondence about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "DyAnn Smith". The signature is fluid and cursive, with the first name "DyAnn" and last name "Smith" clearly distinguishable.

DyAnn Smith  
Patient Relations

Purjury Declare

I Dean Cochran do declare (certify, verify, or state) under penalty of purjury that the foregoing is true and correct.

Dated this 23 day of March, 20 12.

Dean Cochran  
(print)

Dean Cochran  
(signature)

Purjury is a crime as defined by SDCL 22-29-1 and is a felony. If found guilty the penalty is up to 5 years in prison or a \$10,000 fine.



CERTIFICATE OF SERVICE

I, Dean Cochran do hereby certify that on the 11<sup>th</sup> day of March,  
(name) (month)  
2012, I sent a correct copy of the foregoing Civil Complaint  
(year) (document type)  
to be served upon:

Check of Counts  
400 South Phillips Ave #128  
Sioux Falls, SD 57104

by depositing a copy in an envelope sealed and with first class postage fully  
prepaid thereon, in the United States Mail at the City of Sioux Falls,  
(name of city)  
South Dakota, addressed to the above named individual(s) at their  
(state)  
respective foregoing address(es).

Dean Cochran  
(signature)  
**Signature**